

Exhibit 11

1 People - Det. Arroyo - Cross - Rivera 2951

2 Q. And if I -- if -- do you recall her saying that
3 they have lived together for about five, six months, does
4 that refresh your recollection as to what she might have
5 said?

6 A. No, it does not.

7 Q. Now, you testified that you got the grandmother
8 some coffee; is that correct?

9 A. To the best of my recollection, that is correct.

10 Q. Where did you get the coffee from?

11 A. To the best of my recollection, we had a Mr.
12 Coffee like coffee maker.

13 Q. And would this be in the juvenile room?

14 A. No.

15 Q. Where was --

16 MR. RIVERA: Withdrawn.

17 Q. Where is the coffee maker located?

18 A. In the detective squad room.

19 Q. And this is the same detective squad where you're
20 ordinarily assigned; is that correct?

21 A. That's correct.

22 Q. So, you work out of the Central Park Precinct; is
23 that correct?

24 A. That is correct.

25 Q. So, in relationship to the juvenile room, where is

Joseph T. Tierney, CSR, RPR

1 People - Det. Arroyo - Cross - Rivera 2952
2 the Detective Squad?

3 A. It's in another building opposite the juvenile or
4 the community affairs building, across the driveway from the
5 community affairs building.

6 Q. So, did you leave the juvenile room to get the
7 coffee from the detective squad?

8 A. Yes, that's correct.

9 Q. And that's when you got the soda; is that correct?

10 A. At that time, correct.

11 Q. Did you see any coffee in the juvenile room at
12 that point in time?

13 A. No, I did not or there was a machine that
14 wasn't -- that didn't have enough coffee in it for some
15 reason or another. I do believe there is one in there,
16 though.

17 Q. You do recall there being a coffee maker in the
18 juvenile room, is that correct?

19 A. That's correct.

20 Q. And is there a coffee maker or --

21 MR. RIVERA: Withdrawn.

22 Q. Was there coffee or a coffee maker in the clerical
23 office on the 20th of April? I'm referring specifically to
24 what we have termed the clerical office right next to the
25 juvenile room.

Joseph T. Tierney, CSR, RPR

1 People - Det. Arroyo - Cross - Rivera 2964
2 of Raymond by Detective Hartigan; is that correct?

3 MS. LEDERER: Objection.

4 THE COURT: What was your question?

5 MR. RIVERA: That he was present during the
6 entire questioning of Raymond by Detective
7 Hartigan.

8 Q. Is that correct?

9 MS. LEDERER: Objection.

10 THE COURT: I'll let him answer if he was
11 present --

12 Detective Hartigan was present at all times
13 when you were present?

14 THE WITNESS: Detective Hartigan was present
15 when I was present, yes.

16 THE COURT: At all times?

17 THE WITNESS: Except for the times that I
18 left the room, correct.

19 Q. But from 1:40 to 4:40, you were present during the
20 entire questioning of Raymond Santana; is that correct?

21 A. Again, except for those times that I left briefly.

22 Q. Well, when did you leave the room between 1:40 and
23 4:40?

24 A. Well, I left the room to get coffee.

25 Q. Other than that.

Joseph T. Tierney, CSR, RPR

1 People - Det. Arroyo - Cross - Rivera 2965

2 A. I might have also left the room to get myself a
3 soda. I left the room after the signing of the written
4 statement, and that would take us beyond 4:40 p.m.

5 Q. Okay. Raymond signed the statement at about 4:40;
6 is that correct?

7 A. That's correct.

8 Q. That means that the interrogation of Raymond ended
9 about 4:40, would that be correct?

10 A. That's correct.

11 Q. And did you tell Raymond that the interrogation
12 had ended of Raymond?

13 A. No.

14 Q. You, at no time, informed him that your
15 questioning is over; is that correct?

16 A. No.

17 Q. You just took the statement, left the room and
18 came back several minutes later; is that correct?

19 A. That's correct.

20 Q. Now, you took that statement and brought it to
21 your supervisors; is that correct?

22 A. That's correct.

23 Q. And who, in particular, did you bring Raymond's
24 statement to?

25 MS. LEDERER: Objection.

Joseph T. Tierney, CSR, RPR

1 People - Det. Arroyo - Cross - Rivera

2966

2 THE COURT: Who did he what?

3 MR. RIVERA: Who did he bring Raymond's
4 statement to.

5 THE COURT: I'll let him answer. I really
6 don't know what it has to do with this hearing.

7 A. I brought the statement to the detective squad
8 room, where Lieutenant Doyle from Manhattan North Homicide
9 was present.

10 Q. Was ADA Fairstein or ADA Lederer present when you
11 went to bring the statement to Lieutenant Doyle?

12 MS. LEDERER: Objection.

13 THE COURT: I'll let him answer that.

14 A. No, they were not.

15 Q. Did you discuss with Lieutenant Doyle the fact
16 that Raymond's grandmother was present and had difficulty
17 with the English language?

18 MS. LEDERER: Objection.

19 THE COURT: Sustained.

20 Q. Did you ever ask Raymond to put into his own words
21 the statement that is People's 20 in evidence?

22 A. Yes, I asked him if he wanted to write it out.

23 Q. And what, if anything, did Raymond say?

24 A. He said no. I offered to write it out and he
25 agreed.

Joseph T. Tierney, CSR, RPR